## Date TBD

Mr. Alan Seese BP West Coast Products, LLC, Carson Refinery 2350 E 223<sup>rd</sup> St Carson, CA 90749

SUBJECT: A/N 448589- 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan

for SRU

Dear Mr. Seese:

The South Coast Air Quality Management District has reviewed your 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan (OMMP) dated September 8, 2005 for your SRU. This plan includes information regarding emission limits, monitoring equipment, procedures, equipment maintenance, and quality control plans as detailed in §63.1574(f). A summary of the required information is provided below:

	Requirements for Emissions of HAP
Compliance option	Subject to NSPS
Parameters to be monitored	SO <sub>2</sub> concentration using CEMS at SRU thermal oxidizer stack
Emission limits	$SO_2 \le 250$ ppmv (dry basis, 0% excess air) at SRU thermal oxidizer stack
Operating Parameter Limit	Not applicable
Monitoring Procedure (Emissions)	Collect the hourly average SO <sub>2</sub> monitoring data at SRU thermal oxidizer stack according to \$63.1572; calculate and record the 12-hour rolling average SO <sub>2</sub> concentration, and maintain the 12-hour average SO <sub>2</sub> concentration at or below 250 ppmv (dry basis, 0% excess air)
Monitoring Schedule	Continuously when SRU is in operation
QA/QC	Per Performance Specification 2 for SO <sub>2</sub> CEMS [40CFR60 Appendix B] and Quality Assurance Procedure 1 [40CFR60 Appendix F] with RATA annually instead of quarterly
Maintenance Schedule	Inspection three times per week, weekly and quarterly preventive maintenance, and per manufacturer recommendation
Bypass lines	Conduct monthly visual monitoring of car-seal valves on TGTU#2 bypass line to record whether the bypass line valve is maintained in the closed position and whether flow is present in the line. Record and report the time and duration of any bypass.

Based on the information submitted, your SRU 40CFR63 Subpart UUU OMMP has been reviewed and approved, subject to the following conditions.

- 1. Operate at all times according to the procedures in your OMMP.
- 2. Maintain records to document conformance with the procedures in your OMMP.
- 3. Submit changes to this OMMP for approval by the Executive Officer [§63.1574(f)(1)].

If you have any questions, regarding this plan, please contact Ms. Janice West at 909-396-3763.

Sincerely,

Jay Chen Senior Manager Refinery and Waste Management Engineering & Compliance

JC:JW

cc: Ed Pupka